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VIA CM/ECF

Hon. Paul G. Gardephe
Thurgood Marshall United States Courthouse
U.S. District Court for the Southern District of New York
40 Foley Square
New York, NY 10007

Re: *Azima v. Handjani*, 1:21-MC-00501-PGG

Dear Judge Gardephe:

Pursuant to Rules I.A and IV.F of Your Honor's Individual Rules of Practice, Petitioner Farhad Azima and Respondent Amir Handjani respectfully submit this joint letter to request the entry of the enclosed Stipulated Confidentiality Agreement and Protective Order (the "Protected Order"). Your Honor's Model Protective Order serves as the framework for the Protective Order. Since this matter is one brought under 28 U.S.C. § 1782 and not as a conventional civil lawsuit, the parties worked together to modify the Model Protective Order in a manner that would be more appropriate given the nature of this proceeding and the litigation pending in the United Kingdom.

The parties also submit, pursuant to Rule IV.F, a blackline showing all deviations from the Court's Model Protective Order.

The parties respectfully request that the Court enter the enclosed Protective Order. Should the Court have any questions about the Protective Order, undersigned counsel will make themselves available to the Court to address any questions or concerns the Court may have.

Respectfully submitted,

/s/ Kirby D. Behre
Counsel for Petitioner

/s/ Daniel P. Filor

/s/ David G. Barger
Counsel for Respondent

Enclosures